

**From:** [Coltrain, Katrina](#)  
**To:** [Jeff Pearl](#); [Todd Downham \(todd.downham@deq.ok.gov\)](#)  
**Cc:** [Dawn Sullivan](#); [Shannon Sheffert](#); [Mark Zishka](#); [Mark Scott](#); [James Pruett](#); [Amy.Brittain@deq.ok.gov](#); [lwhitehouse@creekcountyonline.com](#); [frank.chiles@atkinsglobal.com](#); [Turner, Philip](#)  
**Subject:** RE: Wilcox Refinery Superfund Site and ODOT Project 29217(04) EW-815 aka 8th St. over Sand Creek, Creek Co., Bristow  
**Date:** Friday, December 18, 2015 2:34:00 PM  
**Attachments:** [grid sampling.pdf](#)

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Jeff, this is my understanding and response to the email attached.

Phil Turner will need to address the use of the screening numbers. These are specific to industrial scenarios only. Material has been placed near residential properties. With the detection limits presented, only a comparison for the industrial worker scenario can be made.

As for the depth profiles, all borrow needs to be characterized. I understand that the depth varies across the area. Given that the exact depth is unknown, I would expect that the field sampler would look at the core recovered prior to collecting the sample in order to limit the possibility of sampling material that is not borrow fill.

Mixing should not be assumed. If the material is deeper than 6inches, then additional samples at depth will be needed. The sample plan, using grid aliquots to make one composite is acceptable, but that composite must be of soils that represent the same depth. Please see the attached document for more clarity on this. Likewise, one sample at a depth of 5-6ft cannot be extrapolated to represent all deeper borrow material. The composite concept can be applied for soils at depth.

I will be out of the office for the next two weeks. Please follow-up with Phil and Todd.

Katrina Higgins-Coltrain  
Remedial Project Manager  
US EPA Region 6  
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214-665-8143

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**From:** Jeff Pearl [mailto:JPEARL@ODOT.ORG]  
**Sent:** Friday, December 18, 2015 2:09 PM  
**To:** Coltrain, Katrina; Todd Downham (todd.downham@deq.ok.gov)  
**Cc:** Dawn Sullivan; Shannon Sheffert; Mark Zishka; Mark Scott; James Pruett; Amy.Brittain@deq.ok.gov; lwhitehouse@creekcountyonline.com; frank.chiles@atkinsglobal.com  
**Subject:** RE: Wilcox Refinery Superfund Site and ODOT Project 29217(04) EW-815 aka 8th St. over Sand Creek, Creek Co., Bristow

Katrina –

Thanks for your comments. Please see our responses below in **green**, and feel free to call if you wish to discuss. Thanks,

Jeff

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**From:** Coltrain, Katrina [<mailto:coltrain.katrina@epa.gov>]

**Sent:** Friday, December 11, 2015 12:56 PM

**To:** Jeff Pearl

**Cc:** Todd Downham; Turner, Philip

**Subject:** RE: Wilcox Refinery Superfund Site and ODOT Project 29217(04) EW-815 aka 8th St. over Sand Creek, Creek Co., Bristow

Jeff, a few comments for your consideration. There may be other comments from the risk assessor and ODEQ. Thank you for the opportunity to review your plan. Please call if you have any questions related to these comments.

1. The grids look to extend past the areas where the soil was placed. All grids should be limited to the extent of soil placement. Any inclusion of soil that is not borrow soil will alter results and potentially 'dilute' the concentration of the borrow soil which is what you are trying to characterize. The grids have been established according to the extent of material placement as determined by interviews with the construction contractor and inspector in a meeting that occurred after you, Todd and I met on-site. ODOT construction personnel, our environmental consultant and myself met with the construction contractor and inspector to further assess where the material in question may have been placed. Based on a review of the construction timeline and documentation, it was determined that material could have been placed in the areas ultimately outlined in the sampling plan, albeit at greatly varying thicknesses. For example, it was initially reported that the material was predominantly in the bridge approaches at a thickness of maybe a foot or two, and in the slope off the southwest corner of the bridge at a much greater thickness due to filling in the prior work road area. In the later meeting it was determined material could also have been "feathered-out" substantially to the west. Although this would likely be a very thin layer, it still seemed appropriate to assess. Please be assured our goal is to make sure we don't leave any possible suspect areas unaddressed, not dilute the samples. ACTION: For the reasons described above, we propose no change to the work plan in this matter.
2. The text indicates that the borrow soils range in depths from 2ft to 8ft. Why is the sample plan only collecting 1 sample per grid from the 0-6in depth? This will not provide information on the remaining fill that was placed on the site. Characterization of the fill will require additional samples. The data from 0-6in is not representative of the entire depth range. As discussed above, the estimated thickness of the material varies greatly. However, the greater thickness is reportedly limited to the area where the former work road was filled, off the southwest corner of the bridge. This is the reason for adding a deeper sample from this area (see also comment 5 below). The thickness reportedly ranges from 0 to 2' in the remaining "thinner" areas (possibly approaching zero in some areas that cannot be determined). For these "thinner" areas, the notion was that the material has likely been mixed substantially via excavation, transport by dump truck, dumping, and then grading, to the extent that sampling to depth and vertically compositing for such a small thickness didn't seem necessary in these areas (in other words, the four-point horizontal composite from 0-6" should be representative). Further, since the thickness of the material varies and cannot be known for certain, sampling deeper actually increases the potential for sampling underlying, non-borrow material, which I think should be avoided (similarly due to the concern of inadvertent dilution). ACTION: If EPA/DEQ concurs with the above

explanation, we propose adding similar language to the work plan for clarity. Conversely, if you still have questions, we respectfully request guidance on how the approach can be improved.

3. Based on the text, soils near the abutments have been overlain with riprap. Though the text is not clear, it is assumed that the sample will be pulled from the borrow soil that was buried. Your assumption is correct. Riprap will be removed manually to facilitate the use of a hand auger to bore into the material in question. No riprap or associated material will be sampled. ACTION: We propose adding similar language to the work plan for clarity.
4. For the grids that include the driveways, if the sample is being collected at the corner of each grid, then the driveway that falls in the center of the grid will only be represented by one sample aliquot and two aliquots will represent soil that was not brought over as fill. Efforts should be made to sample the fill that was brought over and placed in the construction area. Agreed. ACTION: We propose adding clarifying language to the work plan indicating sample points in these areas will be intentionally biased away from areas that do not appear to have had received borrow.
5. What is the purpose of the sample being collected at the 5-6ft depth? See response to comment 2 above.
6. What are the detection limits for the contaminants listed in Table 1? Will the detection limit be low enough to provide information that can be used to assess whether the soil poses a potential risk? Please see the attached table for MDLs and RLs prepared by our environmental consultant. Also listed in the table are the EPA Industrial RSLs, which appear to be achieved. ACTION: Please let us know if any additional information is needed.

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**From:** Jeff Pearl [<mailto:JPEARL@ODOT.ORG>]

**Sent:** Wednesday, December 09, 2015 1:13 PM

**To:** Coltrain, Katrina; Todd Downham ([todd.downham@deq.ok.gov](mailto:todd.downham@deq.ok.gov))

**Cc:** Dawn Sullivan; Shannon Sheffert; Mark Zishka; Mark Scott; James Pruett; [Amy.Brittain@deq.ok.gov](mailto:Amy.Brittain@deq.ok.gov); [lwhitehouse@creekcountyonline.com](mailto:lwhitehouse@creekcountyonline.com); Chiles, Frank F

**Subject:** RE: Wilcox Refinery Superfund Site and ODOT Project 29217(04) EW-815 aka 8th St. over Sand Creek, Creek Co., Bristow

**Importance:** High

Katrina and Todd –

Attached please find the draft work plan for sampling the material in question at the referenced site. As you are well aware, all parties are anxious to get this work done, so we're hoping to get fieldwork started in a week or so. Please feel free to let us know if you have any questions,

comments or concerns so we can keep this project moving.

Once again, we appreciate your patience and cooperation in this matter.

Sincerely,

Jeff

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**From:** Jeff Pearl  
**Sent:** Friday, December 04, 2015 12:26 PM  
**To:** Coltrain, Katrina ([coltrain.katrina@epa.gov](mailto:coltrain.katrina@epa.gov)); Todd Downham ([todd.downham@deq.ok.gov](mailto:todd.downham@deq.ok.gov))  
**Cc:** Dawn Sullivan; Mark Zishka; Mark Scott; James Pruett; 'Amy.Brittain@deq.ok.gov'; 'lwhitehouse@creekcountyonline.com'; Shannon Sheffert; 'Chiles, Frank F'  
**Subject:** FW: Wilcox Refinery Superfund Site and ODOT Project 29217(04) EW-815 aka 8th St. over Sand Creek, Creek Co., Bristow

Katrina and Todd –

I'm told the plan is still being revised and should be ready to submit to the County Monday. I'm hoping to get it to you within a few days thereafter. Thanks, and please feel free to call with questions.

Jeff

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**From:** Jeff Pearl  
**Sent:** Wednesday, November 25, 2015 3:33 PM  
**To:** Coltrain, Katrina; Todd Downham  
**Cc:** Dawn Sullivan; Mark Zishka; Mark Scott; James Pruett; [Amy.Brittain@deq.ok.gov](mailto:Amy.Brittain@deq.ok.gov); [lwhitehouse@creekcountyonline.com](mailto:lwhitehouse@creekcountyonline.com); Shannon Sheffert  
**Subject:** RE: Wilcox Refinery Superfund Site and ODOT Project 29217(04) EW-815 aka 8th St. over Sand Creek, Creek Co., Bristow

Katrina and Todd –

Once again I thank you for your patience in this matter, as there are quite a few parties involved and we're trying not to leave anyone out of the process. Figuring out who's responsible for what has been, to say the least, a challenge.

In short, as indicated below, we have task ordered a consultant to prepare a work plan for sampling and should be putting that in front of the County next week. That should be the last stop before submitting to you and Todd. With a little luck, I'm hoping to have it to you by the end of next week.

Thanks again for your continued cooperation, and feel free to call my cell (405-249-2751) anytime if you have questions.

Jeff

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**From:** Shannon Sheffert  
**Sent:** Wednesday, November 25, 2015 3:28 PM  
**To:** Coltrain, Katrina; Jeff Pearl; Todd Downham  
**Cc:** Dawn Sullivan; Mark Zishka; Mark Scott; James Pruett; [Amy.Brittain@deq.ok.gov](mailto:Amy.Brittain@deq.ok.gov);  
[lwhitehouse@creekcountyonline.com](mailto:lwhitehouse@creekcountyonline.com)  
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Ms. Coltrain, I suspect that Mr. Pearl is off today and won't be back till next week. On that note, in general we are working with Enviro Clean Cardinal LLC for some sampling investigation in all the suspected borrow placement areas on the bridge site. I am not sure of the time frame but they are working on a task order approval to get started soon. I will ask Jeff to respond when he gets back in to the office.

Thanks

Shannon Sheffert

Local Government Division Engineer

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**From:** Coltrain, Katrina [<mailto:coltrain.katrina@epa.gov>]  
**Sent:** Wednesday, November 25, 2015 2:57 PM  
**To:** Jeff Pearl; Todd Downham  
**Cc:** Dawn Sullivan; Shannon Sheffert; Mark Zishka; Mark Scott; James Pruett; [Amy.Brittain@deq.ok.gov](mailto:Amy.Brittain@deq.ok.gov)  
**Subject:** Wilcox Refinery Superfund Site and ODOT Project 29217(04) EW-815 aka 8th St. over Sand Creek, Creek Co., Bristow

Jeff, on October 27, 2015, Todd Downham, ODEQ, and I were at the Wilcox Oil Company Superfund. While at the site, Todd and I noticed that soil was being removed from the superfund site by contractors working on the 8<sup>th</sup> Street Bridge over Sand Creek in Bristow, Oklahoma. We further learned that the soil was being used as fill material along the road and bridge bank. We immediately called and discussed this issue with you over the phone, and then followed that conversation with an onsite meeting the same day.

Please provide us with an update on how the bridge project team plans to move forward.

Thanks

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